

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

LAW OFFICES  
**CHARLES A. GRUEN**  
381 Broadway  
Suite 300  
Westwood, New Jersey 07675  
(201) 342-1212  
Local Counsel for Defendant

KOCH SUPPLY & TRADING, LP,  
  
Plaintiff,

vs.

TRADAX ENERGY, INC.,  
  
Defendant.

Civil Action  
No.: 14-CV-5036

**NOTICE OF DEFENDANT'S MOTION  
TO DISMISS FOR LACK OF PERSONAL  
JURISDICTION, AND, IN THE  
ALTERNATIVE, TO TRANSFER VENUE**

TO: Bruce G. Paulson  
Michael B. Weitman  
SEWARD & KISSEL LLP  
One Battery Park Plaza  
New York, New York 10004

PLEASE TAKE NOTICE that the undersigned, attorneys for Defendant, TRADAX ENERGY, INC., hereby move the Court for an Order dismissing the Amended Complaint pursuant to Federal Rule of Civil Procedure 12(b)(2) for Lack of Personal Jurisdiction and, in the alternative, to Transfer Venue.

PLEASE TAKE FURTHER NOTICE that in support of the Motion, Defendant shall rely upon the Affidavit of Defendant's President Walter Huybregts and the Memorandum of Law, as well as any additional Reply Brief as may be needed.

Respectfully submitted,

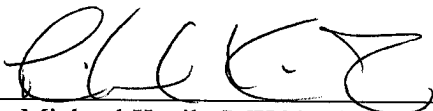
**ANDERSON TOBIN, PLLC**

/s/ Aaron Z. Tobin

Aaron Z. Tobin  
Texas Bar No. 24028045  
J. Seth Moore  
Texas Bar No. 24027522  
One Galleria Tower  
13355 Noel Road, Suite 1900  
Dallas, Texas 75240  
Telephone: (972) 789-1160  
Facsimile: (972) 789-1606  
Email: atobin@andersontobin.com  
smoore@andersontobin.com

*Pro Hac Vice* application pending

LAW OFFICES OF CHARLES A. GRUEN

By: 

Michael Korik (MK0377)  
381 Broadway  
Suite 300  
Westwood, New Jersey 07675  
(201) 342-1212 - Telephone  
(201) 342-6474 - Telecopier  
mkorik@gruenlaw.com

**ATTORNEYS FOR TRADAX ENERGY, INC.**